

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|---------------------------|---|--------------------|
| LISA BARBOUNIS, |) | CIVIL ACTION - LAW |
| |) | |
| Plaintiff |) | |
| |) | |
| -vs- |) | NO. 2:19-cv-05030 |
| |) | |
| THE MIDDLE EAST FORUM, et |) | |
| al., |) | |
| |) | |
| Defendants |) | |
| _____ | X | |

* * *

The recorded video deposition of GREGG ROMAN,
taken remotely via Zoom, on Friday, November 20,
2020, beginning at 11:28 a.m., before Carrie A.
Kaufman, Registered Professional Reporter and Notary
Public in and for the Commonwealth of Pennsylvania.

1 life. I can continue, Mr. Carson, if you would like
2 me to.

3 Q. Do you think Ms. Brady would say that
4 she ruined her life?

5 A. I think that Ms. Brady speaks out of
6 one side of her mouth when she's in testimony and
7 perjures herself and then when she's actually
8 speaking with her friends like we see in her text
9 exchanges with Delaney Yonchek, the truth comes out.
10 And if you had reviewed the messages, and maybe you
11 did, maybe you didn't, between Ms. Yonchek and
12 Ms. Brady, we would understand what they actually
13 think about Lisa Barbounis and how they've had a
14 negative detrimental effect on their life, and, more
15 than that, how Lisa introduced Ms. Brady to you,
16 Mr. Carson, and then led her to be in a legally
17 compromising position where she might get sued
18 because of your malpractice, but we can get into that
19 if you really want to go into it. I mean, I don't
20 think Brady would have met you without Lisa
21 Barbounis, but correct me if I'm wrong.

22 Q. Why is Caitriona Brady going to get
23 sued?

24 A. Well, I'm not saying she's not -- she's
25 in a legally compromising position that may lead her

1 to being sued, but that I guess is something --

2 Q. Sued for what?

3 A. -- that calls for a legal conclusion.
4 That's something that I think -- well, if we actually
5 go into the conclusion on everything, in that case,
6 Mr. Carson, you --

7 Q. Sued -- just sued for what?

8 A. I'm getting there in a second. I don't
9 know the legal term for it, but I'll give you the
10 general characterization.

11 Q. What's the nonlegal term?

12 A. You wrote in Ms. Brady's complaint that
13 I allegedly sexually assaulted Caitriona Brady.

14 Q. That's just flat out not true.

15 A. Mr. Carson, we can go to the complaint
16 if you would like to and I'll tell you what I'm
17 talking about.

18 Q. I mean, we -- look, it's a waste of
19 time because I know exactly what I wrote. Would you
20 like me to --

21 A. Okay.

22 Q. -- show it to you, though?

23 A. I would love to see it. It's in I
24 believe the fourth charge that you offer on Brady,
25 either in the first allegation or the second

1 allegation, but we can get there. So you write --

2 Q. Her complaint -- Mr. Roman, slow down.
3 Her complaint alleges no sexual harassment
4 whatsoever.

5 A. Ms. Brady never alleged sexual
6 harassment against me? That's news to me,
7 Mr. Carson.

8 Q. Well, then you didn't read her
9 complaint, Mr. Roman.

10 A. What you're saying -- you just said
11 Caitriona Brady's complaint does not allege sexual
12 harassment against me?

13 Q. That's correct.

14 A. Okay. That's news to me. Like, let's
15 go to the complaint and see what's going on with it.
16 Let's go to the EEOC filing --

17 Q. We're starting to have a conversation
18 and not a question-answer --

19 A. I'm just saying, you made a statement
20 and I saw it as the form of a question, and I'm
21 trying to get to it.

22 Q. So we don't drive the court reporter
23 crazy let's just try not to talk over each other.

24 A. Sure.

25 Q. It's getting late and it's Friday. I'm

1 sure everyone is tired.

2 Here, I want to do this quickly, so I'm
3 just going to show it to you just to get -- so first
4 amended complaint, filed second amended complaint --
5 all right.

6 A. Right. Mr. Carson, this is the second
7 complaint. There's also a first complaint. We have
8 to --

9 Q. They're all the same, but --

10 A. -- look at the complaints.

11 Q. -- the -- the only difference in the --
12 do you see the first one, first -- this is the first
13 amended --

14 A. So let's go through this and then we
15 can look at the second one.

16 Q. This is all the legal stuff in the
17 case, but --

18 A. Seems like there's a lot of files to
19 review.

20 Q. Yeah. Just -- all the allegations in
21 the amended complaint are in the first complaint.
22 There's -- the amended complaint has more, not less,
23 so --

24 A. Mr. Carson, I have an experience where
25 you say --

1 Q. I want to -- look, every place where it
2 says sex it says discriminated based on her sex and
3 gender, right? Discriminated based on her sex and
4 gender, sex and gender, sex and gender. It doesn't
5 say sexual harassment anywhere in her complaint.

6 A. We have to go -- we have to go to her
7 deposition to see that --

8 Q. Her deposition doesn't allege that
9 either.

10 A. It does allege that. We can go to the
11 history of the deposition that took place. Here we
12 go. Gregg Roman's continuous campaign of sexual
13 harassment. What do you call that, Mr. Carson?

14 Q. Mr. Roman, read it all.

15 A. Far beyond the 2018 statute of
16 limitations that did not end until November 2018.
17 Accordingly, plaintiff claims violations of the
18 continuing violations doctrine. You're claiming that
19 there is a continuing violation doctrine of sexual
20 harassment under sexual harassment laws. Mr. Carson,
21 you have to --

22 Q. It's a typo.

23 A. -- you have -- it's a typo.
24 Mr. Carson, you just represented to me that Caitriona
25 Brady did not sexually harass --

1 Q. Mr. Roman --

2 A. Hold on. Hold on. Hold on. I'm
3 telling you what I see here.

4 Q. I know you're getting excited,
5 Mr. Roman.

6 A. I am excited because you just told me
7 that your client didn't accuse me of sexual
8 harassment and you just showed me a document that
9 accuses me of sexual harassment.

10 Q. I know, but do you notice the
11 difference between her complaint and the others is
12 that they all characterize it as discrimination based
13 on sex and gender, sex and gender --

14 A. Mr. Carson, Mr. Carson, the way in
15 which a lawyer speaks out of both sides of his mouth
16 is not something that I profess to be an expert in.

17 Q. Her complaint --

18 A. What I can tell you --

19 Q. Just slow --

20 A. -- is what you said -- what I can tell
21 you --

22 Q. Slow down. Slow down.

23 A. What I can tell you --

24 Q. Her complaint --

25 A. -- is what you said to me approximately

1 four minutes ago where you said Caitriona Brady never
2 accused me of sexual harassment, then you showed me a
3 complaint where she accuses me of sexual harassment
4 and you're attributing it to a typo. Mr. Carson, the
5 law does not allow for typos. You made my
6 organization spend hundreds of thousands of dollars
7 defending itself against a complaint which resulted
8 in accusations against me of harassment because of
9 your typo. That my dear Mr. Carson is something
10 where I find to be reprehensible and worthy and
11 meritorious of you being sued for vexatious conduct,
12 for liability which comes out of an abuse of civil
13 proceedings, perhaps under the Dragonetti Act, and
14 more than that, more than that, you just acted in
15 such a way where you found yourself in front of the
16 court to be sanctioned not once on July 6th but
17 twice.

18 Q. Mr. Roman, you don't want to start
19 talking about -- that's not going to help your case
20 to talk about.

21 A. Mr. Carson, you paid my organization --

22 Q. Mr. Roman --

23 A. Or not paid. You reimbursed my
24 organization --

25 Q. -- it's not -- not going to help you --

1 A. -- over \$5,000 in fees --

2 Q. I'm trying to help you right now.

3 A. Don't tell me what helps me, Mr.

4 Carson --

5 Q. It's not going to --

6 A. -- I'm trying to help you.

7 THE COURT REPORTER: Can't hear

8 either of you. Can't hear either of

9 you.

10 BY MR. CARSON:

11 Q. You got to stop. I'm trying to --

12 A. Mr. Carson --

13 Q. I'm actually trying to help you right
14 now.

15 A. You can help me as much as you would
16 like.

17 Q. It's not -- it's not going to --

18 A. You can help me as -- you can help me
19 as much --

20 Q. -- help you to sit here and --

21 A. -- you can help me as much as you would
22 like, but, Mr. Carson, if you'll just go to paragraph
23 --

24 Q. Mr. Roman, I'm asking you --

25 A. Okay. I'm trying to just -- I'm trying

1 to get here.

2 Q. There's no question --

3 A. I'm sorry. I'm going to take a -- I'm
4 going to take a breath. I'm going to take a breath.
5 Okay?

6 THE COURT REPORTER: This is --
7 okay. Stop. Please.

8 THE WITNESS: I'm going to breathe
9 in. I'm going to drink some water. I'm
10 going to calm down. Okay?

11 MR. GOLD: Why don't we take a
12 five-minute break.

13 THE WITNESS: Do you want to take
14 a break? Take a break.

15 THE VIDEO SPECIALIST: We're off
16 the record. It's 5:47 p.m. Eastern.

17 (A brief recess was taken.)

18 THE VIDEO SPECIALIST: It's 5:59
19 p.m. and we're back on the record.

20 MR. CARSON: Yeah, for the record,
21 Mr. Gold, when you give your -- when you
22 tell your client what to say during a
23 deposition in the middle of a deposition
24 you should put yourself on mute.
25 Everyone can hear you giving your client

1 advice.

2 BY MR. CARSON:

3 Q. But to continue the deposition,
4 Mr. Roman, can you hear me?

5 A. Yes.

6 Q. Do you understand sitting here today
7 that neither Caitriona Brady nor Delaney Yonchek ever
8 accused you of sexual assault or sexual harassment?

9 A. I would point you to Paragraph 364 in
10 the second amended complaint of Ms. Brady
11 allegations --

12 Q. Yeah, did you read --

13 A. -- and Paragraph --

14 Q. -- the rest of the complaint?

15 A. -- and Paragraph 366 of the first
16 amended complaint, and if you would like me to be
17 able to comment on that we can read the paragraphs --

18 Q. No, I don't need you to comment. Do
19 you understand that the rest of the complaint alleges
20 sex and gender discrimination throughout?

21 A. I understand in part it alleges sex and
22 gender discrimination, but it also alleges sexual
23 harassment and sexual assault, two things which your
24 client --

25 Q. Where does it allege --

1 A. -- admitted under oath didn't happen.

2 Q. -- sexual assault, Mr. Roman?

3 A. 364 and 366, second amended complaint
4 and first amended complaint --

5 Q. 364 of the what?

6 A. 364 of the second amended complaint and
7 366 in the first amended complaint. Is that also a
8 typo?

9 Q. 364 of the second amended complaint.

10 A. Correct.

11 Q. Defendant Middle East Forum breached
12 its duty of care and this directly caused the sexual
13 assault of plaintiff Caitriona Brady, yes, yeah, it
14 is a typo actually.

15 A. So you made a typo in your complaint
16 accusing me of sexual assault.

17 Q. Your client -- your lawyer --

18 A. I don't have a client.

19 Q. Your lawyers understood the entire time
20 we've litigated this case that there was never a
21 sexual assault --

22 A. Mr. Carson, this is what I understand.
23 I understand that you filed a public document --

24 Q. I didn't ask -- I didn't ask a question
25 yet.

1 A. Okay. You asked me where it says it, I
2 told you where you said it, you just read it, it says
3 that you accused me of sexual assault --

4 Q. There is no question on the record.
5 This isn't a conversation.

6 A. I'm not saying --

7 Q. It's not a conversation.

8 A. I took that as a question. I apologize
9 if I mischaracterized your statement.

10 MR. CAVALIER: I am going to state
11 for the record that your categorization
12 of what Mr. Roman's lawyers understood
13 throughout the entirety of this case is
14 inaccurate.

15 MR. CARSON: It's not inaccurate
16 at all. You guys didn't ask one
17 question at her deposition about a
18 sexual assault.

19 MR. CAVALIER: That's false.

20 MR. CARSON: No, it's not. I'm
21 going to continue, though.

22 BY MR. CARSON:

23 Q. So to continue this -- this deposition,
24 so after the AIPAC conference in -- strike that.

25 After the trip to Israel that you made